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authorizations
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARIA MANOSALVES and
CARLOS MANOSALVES,

Plaintiffs,

-against-

FUJITSU TRANSACTION SOLUTIONS, INC.

Defendant.

07 Civ. 3846

**PLAINTIFFS'
RESPONSE TO
DEFENDANT'S
F.R.C.P. 34 DEMANDS**

Plaintiffs, Maria Manosalvas and Carlos Manosalvas by their attorneys,

Baker, Leshko, Saline & Blosser, LLP, responding to defendant Fujitsu

Transaction Solutions, Inc, F.R.C.P. 34 Demands, hereby respond as follows:

DOCUMENT DEMAND 1:

Provide copies of all statements, whether signed or otherwise, whether written or oral, of Defendant, FUJITSU TRANSACTION SOLUTIONS, INC., and/or its agents, servants, or employees.

RESPONSE 1:

Plaintiffs are not in possession of any statements.

DOCUMENT DEMAND 2:

Duly executed and acknowledged authorizations, with the name and address of the entity from which materials will be requested, permitting the Defendant to obtain and copy all hospital, pharmacy, and physician records including reports of all diagnostic studies including but not limited to x-rays, CT scans and MRI reports for the Plaintiff, Maria Manosalvas, in connection with the injuries and conditions for which recovery is sought.

RESPONSE 2:

Attached hereto as Exhibit "A".

DOCUMENT DEMAND 3:

All existing and future reports of all physicians or other health care personnel who have treated or examined the Plaintiff, Maria Manosalvas, in connection with the injuries and conditions for which recovery is sought.

RESPONSE 3:

Attached hereto as Exhibit "A".

DOCUMENT DEMAND 4:

Duly executed and acknowledged authorization, with the name and address of the entity from which materials will be requested, permitting the Defendant to obtain and copy all records, reports, etc. maintained by the New York State Workers' Compensation Board relating to the Plaintiff's accident of March 5, 2007.

RESPONSE 4:

Attached hereto as Exhibit "B".

DOCUMENT DEMAND 5:

Duly executed and acknowledged authorization, with the name and address of the entity from which materials will be requested, permitting the Defendant to obtain and copy all employment records of the Plaintiff, Maria Manosalvas, from Marshall's.

RESPONSE 5:

Attached hereto as Exhibit "C".

DOCUMENT DEMAND 6:

Provide copies of the Federal and State Tax Returns of the Plaintiffs for the past five (5) years and duly executed authorizations allowing Defendant to obtain those records.

RESPONSE 6:

Attached hereto as Exhibit "D".

DOCUMENT DEMAND 7:

Duly executed and acknowledged authorization, with the name and address of the entity from which materials will be requested, permitting the Defendant to obtain and copy all records from Plaintiff's workers' compensation insurance carrier, if any.

RESPONSE 7:

Not applicable.

DOCUMENT DEMAND 8:

Duly executed and acknowledged authorization, with the name and address of the entity from which materials will be requested, permitting the Defendant to obtain and copy all records from Plaintiff's health insurance carrier at the time of the accident on March 5, 2005.

RESPONSE 8:

Not applicable.

DOCUMENT DEMAND 9:

Any and all photographs, slides, films, and/or videotapes of the scene of the incident which is the subject of this litigation, all instrumentalities involved, and any damages and/or injuries sustained not previously disclosed.

RESPONSE 9:

Defendant is already in possession of photographs as they were given in Plaintiff's Rule 26 Initial Disclosure.

DOCUMENT DEMAND 10:

Please produce all reports or other statements prepared by an expert witness you have consulted or retained to testify in this action, including, but not limited to, the report pursuant to F.R.C.P. 26(a) (2) (B). The latter should contain a complete statement of all opinions to be expressed and the basis and reasons therefore; the data or other information considered by the witness in forming the opinions; and any exhibits to be used as a summary of or support for the opinions, the qualifications of the witness, including a list of all publications authored by the witness within the preceding ten years; the compensation to be paid for the study

and testimony; and a listing of any other cases in which the witness has testified as an expert at trial or by deposition within the preceding four years.

RESPONSE 10:

Plaintiffs have not retained any experts at the present time, and will disclose any such information at the time such expert(s), if any, is retained and in accordance with the FRCP.

DOCUMENT DEMAND 11:

Produce all documents reviewed, considered or relied upon by each of your expert witnesses, designating the documents by the expert who saw them.

RESPONSE 11:

Please see Response 10.

DOCUMENT DEMAND 12:

Produce the curriculum vitae and resume of each of your expert witnesses.

RESPONSE 12:

Please see Response 10.

DOCUMENT DEMAND 13:

Provide an appropriate identification of each document or other exhibit, including summaries of other evidence, separately identifying those which you expect to offer at trial and those which you may offer if the need arises.

RESPONSE 13:

Will provide the same when ascertained.

DOCUMENT DEMAND 14:

Provide a copy of, or a description by category and location of, any documents, data compilations, and tangible things in your possession, custody or control that are relevant to the facts alleged in your complaint.

RESPONSE 14:

Previously provided.

DOCUMENT DEMAND 15:

Provide a copy of any and all written material in Plaintiff Maria Manosalvas' possession she received from Marshall's concerning any facet of her employment with the company, including but not limited to instructions, procedures, safety or training manuals, brochures, letters, flyers and pamphlets.

RESPONSE 15:

Plaintiff is not in possession of any such material.

DOCUMENT DEMAND 16:

Produce for inspection and copying all documents which are identified, referred to, or relied upon in your response to the interrogatories set forth in Defendant's First Set of Interrogatories to Plaintiff.

RESPONSE 16:

Previously provided.

Dated: White Plains, New York
October 16, 2007

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